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March 26, 2021

VIA ECF

Hon. Vernon S. Broderick, USDJ
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 3/29/2021

Re: *Emanuel Preldakaj v. The Monarch Condominium, et al.*,
Case No. 1:20-cv-09433 (VSB)

Dear Judge Broderick:

This firm represents the Defendants in the above-referenced action. Pursuant to Sections 1.A and 1.G of Your Honor's Individual Rules & Practices in Civil Cases, we write to respectfully request, on consent, an extension of the stay currently in effect in the above-captioned action, from Wednesday, March 31, 2021 through Friday, April 16, 2021.

This is the first request for an extension of the stay of proceedings so ordered by this Court on December 22, 2020. *See* Dkt. 15. Defendants had sought the stay, on consent, to permit the parties to engage in mandatory mediation concerning the claims in this matter, as required by the applicable collective bargaining agreement. *See* Dkt. 14. The parties participated in a mediation session on Wednesday, March 24. Although the parties did not fully resolve their dispute, the session was productive and the parties jointly agreed to reconvene for a second mediation session, to be held on Tuesday, April 13. There are no scheduled hearings or appearances in this matter that would be affected by the requested extension.

Accordingly, and to permit the parties additional time for the parties to complete the mediation process and attempt resolution of their dispute, Defendants respectfully request with Plaintiff's consent that the Court extend its prior stay of all proceedings and any pending deadlines in this matter through April 16, 2021.

We greatly appreciate the Court's time and attention to this matter.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP

Attorneys for Defendants



By: Stephen P. Pischl

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cc: **VIA ECF**
MC LAUGHLIN STERN
Attorneys for Plaintiff